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1 2 3 4 5 6 7 8	ANN MILLER RAVEL, County Counsel (S.B. #62139) MELISSA R. KINIYALOCTS, Deputy County Counsel (S.B. #215814) GREGORY J. SEBASTINELLI, Deputy County Counsel (S.B. #104884) OFFICE OF THE COUNTY COUNSEL 70 West Hedding, East Wing, 9 <sup>th</sup> Floor San Jose, California 95110-1770 Telephone: (408) 299-5900 Facsimile: (408) 292-7240  Attorneys for Defendants EMILY TJHIN AND MELISSA SUAREZ  ROBERT R. POWELL, Esq. (S.B. #159747) DENNIS INGOLS, Esq. (S.B. #236548) LAW OFFICES OR ROBERT R. POWELL
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11	Attorneys for Plaintiffs LORI BELTRAN, ROBERT BELTRAN, and *E-FILED - 11/21/08*
12	COBY BELTRAN, by and through his Guardian Ad Litem LORI BELTRAN
13	Guardian Au Eitem Eold BEETIGAN
14	
15	UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA
16	(San Jose Division)
17	
	LODIDELTD AN et al
18	LORI BELTRAN et al., ) No. C 03 03767 RMW
19	Plaintiffs,  ) STIPULATION AND ORDER TO EXTEND  THE DEADLINES FOR EXPERT
20	v. ) DISCLOSURE AND THE EXPERT ) DISCOVERY CUTOFF
21	COUNTY OF SANTA CLARA et al.,
22	Defendants.
23	)
24	On November 7, 2008, Defendants Melissa Suarez and Emily Tjhin filed an ex parte
25	motion to extend the deadlines for expert disclosure and the expert discovery cutoff. On
26	November 10, 2008, counsel for the parties met and conferred and reached an agreement to
27	extend the deadlines for expert disclosure and the expert discovery cutoff. As such, the pending
28	ex parte motion to extend the deadlines for expert disclosure and the expert discovery cutoff is
EL	Stipulation and Order to Extend

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1	now moot.
2	On August 15, 2008, the Court held a case management conference during which it set
3	this matter for trial on April 6, 2009. The Court set deadlines of December 1, 2008, for expert
4	disclosure and December 22, 2008, for the expert discovery cutoff.
5	Due to the limited availability of counsel and witnesses, the depositions of percipient
6	witnesses in this matter will not be completed before the December 1st expert disclosure. As
7	such, the parties agree that an extension of the deadlines for expert disclosure and the expert
8	discovery cutoff is necessary.
9	Accordingly, the parties stipulate to extend the expert discovery deadlines as follows:
10	Expert disclosure January 21, 2009
11	Expert discovery cutoff February 13, 2009
12	I hereby attest that I have on file all holograph signatures for any signatures indicated by a
13	"conformed" signature (/S/) within this efiled document.
14	ANN MILLER RAVEL County Counsel
15	County County
16	Dated: November 13, 2008  By: /S/ MELISSA R. KINIYALOCTS
17	Deputy County Counsel
18	Attorneys for Defendants EMILY TJHIN and MELISSA SUAREZ
19	
20	LAW OFFICES OR ROBERT R. POWELL
21	
22	
23	Dated: November 11, 2008  By: /S/  DENNIS INGOLS
24	Attorney for Plaintiffs
25	LORI BELTRAN, ROBERT BELTRAN, and COBY BELTRAN
26	
27	
28	
AVEL el	Stipulation and Order to Extend

ANN MILLER RAVEL
County Counsel
County of Santa Clara
San Jose, California

**ORDER** The Court, having considered the stipulation to extend the deadlines for expert disclosure and the expert discovery cutoff and finding good cause, hereby orders that the deadline for expert disclosure is extended to January 21, 2009, and the expert discovery cutoff is extended to February 13, 2009. Dated:\_ 11/20/08 United States District Court Judge 153622.wpd Stipulation and Order to Extend

ANN MILLER RAVEL
County Counsel
County of Santa Clara